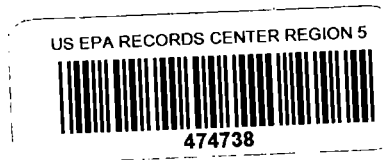




Minnesota Pollution Control Agency

March 17, 2006



Mr. Charles Meyer, City Manager
City of St. Louis Park
5065 Minnetonka Boulevard
St. Louis Park, MN 55416

Mr. Thomas Reilly, Jr., President
Reilly Industries
300 North Meridian Street, Suite 1500
Indianapolis, IN 46204-1763

RE: Reilly Tar Superfund Site, Request for Approval of Cessation of Well 434

Dear Mr. Meyer and Mr. Reilly:

The Minnesota Pollution Control Agency (MPCA) received a request from William Gregg dated April 15, 2005 and received on April 19, 2005 to cease operation of Platteville Aquifer gradient control well W434 in accordance with Section 9.2 of the Consent Decree-Remedial Action Plan (CD-RAP). This request was also provided to the U.S. Environmental Protection Agency (U.S. EPA). In response to this request a time extension was requested by the Agencies to allow a response by June 20, 2005.

On June 20, 2005 a letter from the MPCA and EPA denied the request for cessation of well 434. A major reason in the denial of this request was the presence of vinyl chloride in the vicinity of Well 434. A meeting was held at the MPCA on July 13, 2005 to discuss this issue. At that time it was agreed to operate Well 434 while the MPCA did some further investigation for Volatile Organic Contaminants (VOC's) in the vicinity of the well.

On January 23, 2006, William Gregg sent a letter indicating that the City still wanted to cease operation of well 434. This letter came after the City had allowed the MPCA additional time to study the VOC plume in the area of well 434.

The City's letter of April 15, 2005 provided justification that the cessation criteria for Well 434 had been met as follows:

1. Cessation Concentrations. The contamination levels are below the Minnesota Department of Health (MDH) Health Risk Limits (HRL). Additionally, the Platteville aquifer is not used as a drinking water aquifer.
2. Compliance with Gradient Control Objectives. Well 434 has a very small capture area. Contamination levels are low, and well 421 is capturing the contamination that has shown at wells 426 and 437.

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3. Assessment of Contaminant Spreading. Table 2 of the April 15, 2005 letter lists the wells to be sampled. In addition, as indicated in the 2006 sampling plan, well 434 will continue to be sampled. For 2006 this would be semi-annually. We are also requesting yearly PAH samples from the following wells that are located near well 434 to better enable us to monitor the ground water contamination in this area. Please sample well 120 in the Platteville aquifer and wells 128 and 135 in the Drift Aquifer.
4. Criteria to Resume Gradient Control. Table 1 of the April 15, 2005 letter contains cessation criteria for well 434. Should these criteria be exceeded, well 434 will need to be turned on again.

At this time, the Agencies concur that Well 434 has met the cessation criteria and is no longer needed to address the known PAH contamination from the Reilly Tar Site. The well can be turned off. However, as indicated in item four above, should the levels of contamination exceed the cessation criteria this well would have to be turned back on.

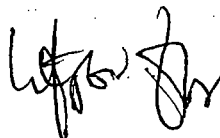
The MPCA is also requesting continued cooperation of the City in collecting VOC samples from the Reilly Tar monitoring well network. The VOC plume needs to be tracked and the City's help in collecting these samples will be appreciated.

Please inform the Agencies when well 434 is shut off. If you have any questions in this matter, please feel free to contact Nile Fellows at (651) 296-7299.

Sincerely,



Nile Fellows
Project Leader
Superfund Unit 1
Superfund and Emergency Response Section
Remediation Division



Darryl Owens
Project Manager
Superfund
U.S. EPA

NF/DO:csa

cc: Mike Rardan, City of St. Louis Park
Virginia Yingling, MDH
William M. Gregg, ENSR